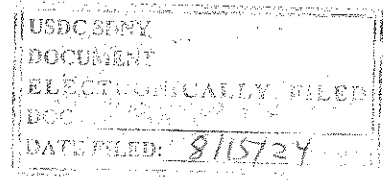


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



EDMAR FINANCIAL COMPANY, LLC; IRISH
BLUE & GOLD, INC.; and XTX MARKETS
LIMITED,

Plaintiffs,

v.

CURRENEX, INC.; GOLDMAN SACHS & CO.
LLC; HC TECHNOLOGIES, LLC; STATE
STREET BANK AND TRUST COMPANY;
STATE STREET GLOBAL MARKETS
INTERNATIONAL LIMITED; and JOHN DOE
DEFENDANTS 1-5,

Defendants.

Case No. 1:21-cv-06598 (LAK)

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER REGARDING CASE
MANAGEMENT SCHEDULE EXTENSION**

WHEREAS, on August 10, 2023, counsel for Plaintiffs Edmar Financial Company, LLC, Irish Blue & Gold, Inc., and XTX Markets Limited (together, "Plaintiffs") filed a letter to the Court with the consent of Defendants Currenex, Inc., State Street Global Markets International Limited, Goldman Sachs & Co. LLC, HC Technologies, LLC, and State Street Bank and Trust Company (collectively, "Defendants") requesting the Court approve the jointly proposed scheduling order attached thereto as Exhibit A (Dkt. No. 97);

WHEREAS, on August 14, 2023, the Court entered an order granting the jointly proposed scheduling order (Dkt. No. 98);

WHEREAS, due to the complexities and data-driven nature of this case, the parties jointly request that certain Case Management Schedule dates be extended to permit time for the

parties to complete discovery in advance of class certification briefing and any Daubert challenges;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the signatory parties, subject to the Court's approval, that the Case Management Schedule be modified to reflect the following extensions:¹

Event	Current Schedule	Proposed Extension
Fact discovery commences, and parties may serve discovery requests.	Friday, August 18, 2023	n/a
Disclosure of witnesses covered by 26(a)(1)(A)(i) (in lieu of full Rule 26(a) disclosures).	Monday, August 21, 2023	n/a
Parties to jointly submit to the Court proposed ESI order and proposed protective order.	Monday, August 28, 2023	n/a
Parties to meet and confer regarding forms and types of structured/transactional data.	Monday, September 11, 2023	n/a
Rolling productions of documents begin.	Saturday, November 18, 2023	n/a
Deadline to add parties.	Monday, March 18, 2024	n/a
Substantial completion of production of documents, including transactional data.	Monday, March 18, 2024	Tuesday, December 17, 2024
Deadline for serving RFAs and interrogatories.	Thursday, July 18, 2024	Friday, April 18, 2025

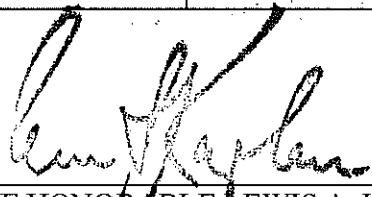
¹ All interim deadlines other than class certification motions may be extended by agreement of the parties. *See* Endorsed Case Management Schedule (ECF No. 98).

Event	Current Schedule	Proposed Extension
Completion of fact discovery, including all depositions of fact witnesses.	Sunday, August 18, 2024	Monday, May 19, 2025
Class certification motion due and supporting expert reports due , including all data and code relied upon by Plaintiffs' experts.	Friday, October 18, 2024	Friday, July 18, 2025
Class certification opposition and supporting expert reports due , including all data and code relied upon by Defendants' experts. Any Daubert challenges to Plaintiffs' class certification experts due , including all data and code relied upon by Defendants' experts.	Monday, January 20, 2025	Tuesday, October 21, 2025
Class certification reply and any supporting reply expert reports due , including all data and code relied upon by Plaintiffs' experts. Plaintiffs' oppositions to any Daubert motions by Defendants due , including all data and code relied upon by Plaintiffs' experts. Any Daubert challenges to Defendants' class certification experts due , including all data and code relied upon by Plaintiffs' experts.	Thursday, March 20, 2025	Friday, December 19, 2025

Event	Current Schedule	Proposed Extension
Defendants' replies in support of Defendants' Daubert motions due (including all data and code relied upon by Defendants' experts). Defendants' oppositions to Plaintiffs' Daubert motions due (including all data and code relied upon by Defendants' experts).	Monday, May 05, 2025	Tuesday, February 03, 2026
Plaintiffs' replies in support of Plaintiffs' Daubert motions due (including all data and code relied upon by Plaintiffs' experts).	Thursday, June 05, 2025	Friday, March 06, 2026
Additional expert discovery.	Parties to confer and submit proposal within 30 days of class certification ruling.	Parties to confer and submit proposal within 30 days of class certification ruling.
Deadline for summary judgment motions.	Within 90 days of the close of expert discovery.	Within 90 days of the close of expert discovery.

IT IS SO ORDERED.

DATED: 8/15/24


THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

Dated: July 31, 2024
New York, New York

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